

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE	)	Chapter 7
	)	
MICHAEL S. HELMSTETTER,	)	Case No. 19 – 28687
	)	
Debtor.	)	Hon. Jacqueline P. Cox
	)	
	)	Hearing Date and Time:
	)	December 4, 2019 at 9:30 am

**NOTICE OF ROUTINE MOTION**

TO: Attached Service List

**PLEASE TAKE NOTICE THAT** on December 4, 2019, at 9:30 a.m., I shall appear before the Honorable Jacqueline P. Cox, or any other judge sitting in her stead, Room 680, 219 South Dearborn Street, Chicago, Illinois, and request a hearing on the Chapter 7 Trustee's Routine Motion to Enter Order Extending Time to File Adversary Complaint Objecting to Discharge, a copy of which is attached hereto and thereby served upon you.

**CERTIFICATE OF SERVICE**

I, the undersigned, an attorney, hereby state that pursuant to Section II, B, 4 of the Administrative Procedures for the Case Management/Electronic Case Filing System, I caused a copy of the foregoing NOTICE OF MOTION and MOTION to be served on all persons set forth on the attached Service List identified as Registrants through the Court's Electronic Notice for Registrants and, as to all other persons on the attached Service List by mailing a copy of same in an envelope properly addressed and with postage fully prepaid and by depositing same in the U.S. Mail, Chicago, Illinois, on 27<sup>th</sup> day of November, 2019.

/s/ Gregory K. Stern  
Gregory K. Stern

Gregory K. Stern (Atty. ID #6183380)  
Monica C. O'Brien (Atty. ID # 6216626)  
Dennis E. Quaid (Atty. ID #02267012)  
Rachel S. Sandler (Atty. ID #6310248)  
53 West Jackson Boulevard  
Suite 1442  
Chicago, Illinois 60604  
(312) 427-1558

## **SERVICE LIST**

### **Registrants Served Through The Court's Electronic Notice For Registrants**

Patrick S. Layng  
Office of the U.S. Trustee, Region 11  
219 South Dearborn Street, Room 873  
Chicago, Illinois 60604

David R. Herzog  
Herzog & Schwartz PC  
77 West Washington Street  
Suite 1400  
Chicago, Illinois 60602

J Kevin Benjamin  
Benjamin & Brand  
1016 West Jackson Boulevard  
Chicago, Illinois 60607-2914

Debra Devassy Babu  
Askounis & Darcy, PC  
444 North Michigan Avenue  
Suite 3270  
Chicago, Illinois 60611

Jamie L Burns  
Levenfeld Pearlstein, LLC  
2 North LaSalle Street  
Suite 1300  
Chicago, Illinois 60602

Whitman H. Brisky  
Mauck & Baker LLC  
1 North LaSalle Street  
Suite 600  
Chicago, Illinois 60602

### **Parties Served By United States Mail**

Michael S. Helmstetter  
PO Box 11703  
Chicago, Illinois 60611-0703

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**MOTION TO EXTEND TIME TO FILE OBJECTIONS TO DISCHARGE**

Now comes N. Neville Reid, Chapter 7 Trustee (the ‘Trustee’), by and through his attorneys, Gregory K. Stern, Monica C. O'Brien, Dennis E. Quaid and Rachel S. Sandler, and in support of his Motion to Extend Time to File Objections to Discharge, states as follows:

1. On October 9, 2019, Michael S. Helmstetter (the “Debtor”) caused a Voluntary Petition for relief under Chapter 7 of the United States Bankruptcy Code to be filed; and David R. Herzog (the “Trustee”) was appointed as trustee in this case.

2. The Debtor’s meeting of creditors, pursuant to 11 U.S.C. § 341, was initially scheduled and held on November 15, 2019, and was continued to January 6, 2020.

3. The Debtor’s Chapter 7 Schedules reflect extensive assets and business interests, including but not limited to bank accounts, equity interests in automobile dealerships, reinsurance companies and other entities, tax refunds and causes of action having a scheduled value of \$8,414,579.67.

4. The Debtor’s Chapter 7 Schedules reflect priority unsecured debt of \$888,338.81 and non-priority unsecured debt of \$5,607,106.87.

5. The deadline for the Trustee to file objections to discharge is on or before January 14, 2020.

6. The Trustee has just begun his investigation of the Debtor's assets and business interests and has only recently engaged attorneys to represent and assist him in this matter.

7. The Trustee requests an extension of the deadline to file objections to discharge pursuant to 11 U.S.C. § 727 up to and including June 30, 2020.

WHEREFORE, the Trustee prays for entry of an Order extending the time to file an adversary complaint objecting to discharge under 11 U.S.C. § 727 to June 30, 2020; and, for such other further relief as this Court deems just.

/s/ Gregory K. Stern  
Gregory K. Stern, Attorney For Trustee

Gregory K. Stern (Atty. ID #6183380)  
Monica C. O'Brien (Atty. ID # 6216626)  
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